

Office of the General Counsel
Clark County School District
S. SCOTT GREENBERG, ESQ.
Nevada Bar No. 4622
5100 W. Sahara Ave.
Las Vegas, Nevada 89146
(702) 799-5373
(702) 799-5505 (Fax)
Attorneys for Defendants
LAUREN LONGMIRE and CLARK COUNTY SCHOOL DISTRICT

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MICHAEL HILL,

Plaintiff,

v.

LAUREN LONGMIRE and CLARK
COUNTY SCHOOL DISTRICT,

Defendant.

Case No.

**NOTICE OF REMOVAL OF ACTION
PURSUANT TO 28 U.S.C. SECTION
1441 - FEDERAL QUESTION**

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendants, LAUREN LONGMIRE and CLARK COUNTY SCHOOL DISTRICT, by and through their counsel, S. SCOTT GREENBERG, Assistant General Counsel, hereby remove the state court action described below to the United States District Court for the District of Nevada.

1. Plaintiff MICHAEL HILL commenced an action in the Eighth Judicial District Court of the State of Nevada, in and for the County of Clark, styled Hill v. Longmire, et al., Case No. A-13-693815-C, attached hereto as Exhibit 1.

2. Defendants Longmire and Clark County School District were served with a copy of the Summons and Complaint on or about January 14, 2014, and January 8, 2014, respectively. No other defendants

1 are named in the action; therefore, on information and belief, no
2 other defendants have been served with a copy of the Summons and
3 Complaint. This notice is jointly filed and is being filed within
4 thirty (30) days of Defendants Longmire and Clark County School
5 District being served.

6 3. This action is a civil action over which this Court has
7 original jurisdiction under 28 U.S.C. Section 1331, and is one
8 which may be removed to this court by Defendant pursuant to 28
9 U.S.C. Section 1441 as the matter involves a federal question. The
10 complaint is captioned "Complaint for Relief from Workplace
11 Harassment, Discrimination and Racism" (see Exhibit 1 at p. 1) and
12 Plaintiff has filed underlying EEOC discrimination charges (EEOC
13 Nos. 487-2012-01326 and 34B-2013-01064) referencing Title VII of
14 the Civil Rights Act of 1964.

15 4. This Court is the proper venue for the removal of this
16 action based upon the allegations in Plaintiff's complaint.

17 5. Defendants Longmire and Clark County School District have
18 joined this removal and there are no other defendants to consent to
19 removal of this action.

20 DATED this 28th day of January, 2014.

21 CLARK COUNTY SCHOOL DISTRICT
22 OFFICE OF THE GENERAL COUNSEL

23 By: /s/ S. Scott Greenberg
24 S. SCOTT GREENBERG
25 Assistant General Counsel
26 5100 W. Sahara Ave.
27 Las Vegas, Nevada 89146
28 (702) 799-5373
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of January, 2014, a copy of the foregoing NOTICE OF REMOVAL OF ACTION PURSUANT TO 28 U.S.C. SECTION 1441 - FEDERAL QUESTION was served by enclosing a true and correct copy of the same in an envelope, postage prepaid thereon, and addressed as follows:

Michael Hill
4020 Arville Street #192
Las Vegas, Nevada 89103
Plaintiff in Proper Person

/s/ Joan Mortimer
AN EMPLOYEE OF THE CLARK COUNTY
SCHOOL DISTRICT

EXHIBIT 1

SUMM

Michael Hill
4020 Arville Street #192
Las Vegas, NV 89103
702-763-0000
PLAINTIFF IN PROPER PERSON

DISTRICT COURT
CLARK COUNTY, NEVADA

Michael Hill
4020 Arville Street #192
Las Vegas, Nevada 89103,

Plaintiff(s),

-vs-

Lauren Longmire
4499 Arville Street
Las Vegas, Nevada 89103
And
Clark County School District
5100 West Sahara Ave
Las Vegas Nevada 89146,

Defendant(s).

CASE NO. A-13-693815-C
DEPT. NO. 111

SUMMONS - CIVIL

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU
WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS.
READ THE INFORMATION BELOW.**

TO THE DEFENDANT(S): A civil Complaint has been filed by the Plaintiff(s) against
you for the relief set forth in the Complaint.

1. If you intend to defend this lawsuit, within 20 days after this Summons is
served on you, exclusive of the day of service, you must do the following:

1 (a) File with the Clerk of this Court, whose address is shown below, a
2 formal written response to the Complaint in accordance with the rules
3 of the Court, with the appropriate filing fee.

4 (b) Serve a copy of your response upon the attorney whose name and
5 address is shown below.
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2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and failure to so respond will result in a judgment of default against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.
3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.
4. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators each have 45 days after service of this Summons within which to file an Answer or other responsive pleading to the Complaint.

Submitted by:


Michael Hill

STEVEN D. GRIERSON
CLERK OF COURT

By: KADIRA BECK
Deputy Clerk



Regional Justice Center
200 Lewis Avenue
Las Vegas, NV 89155

NOTE: When service is by publication, add a brief statement of the object of the action. See Nevada Rules of Civil Procedure 4(b).

AFFIDAVIT OF SERVICE

STATE OF)
) ss:
 COUNTY OF)

_____, being duly sworn, says: That at all times herein affiant was and is over 18 years of age, not a party to nor interested in the proceeding in which this affidavit is made. That affiant received _____ copy(ies) of the Summons and Complaint, _____ on the _____ day of _____, 20____ and served the same on the _____ day of _____, 20____ by:

(Affiant must complete the appropriate paragraph)

1. Delivering and leaving a copy with the Defendant _____ at (state address) _____
2. Serving the Defendant _____ by personally delivering and leaving a copy with _____, a person of suitable age and discretion residing at the Defendant's usual place of abode located at (state address) _____

[Use paragraph 3 for service upon agent, completing (a) or (b)]

3. Serving the Defendant _____ by personally delivering and leaving a copy at (state address) _____
 - (a) With _____ as _____, an agent lawfully designated by statute to accept service of process;
 - (b) With _____, pursuant to NRS 14.020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.
4. Personally depositing a copy in a mail box of the United States Post Office, enclosed in a sealed envelope, postage prepaid (Check appropriate method):
 - ☐ Ordinary mail
 - ☐ Certified mail, return receipt requested
 - ☐ Registered mail, return receipt requested

addressed to the Defendant _____ at Defendant's last known address which is

(state address) _____

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

EXECUTED this _____ day of _____, 20_____.

Signature of person making service

Michael Hill
4020 Arville Street #192
Las Vegas, NV 89103
702-763-0000
PLAINTIFF IN PROPER PERSON

FILED
DEC 31 2013
Debra L. Hill
CLERK OF COURT

DISTRICT COURT
LAS VEGAS, NEVADA

Michael Hill
4020 Arville Street #192
Las Vegas, Nevada 89103,

) Case No.: A-13-693 815-C

)

) Department III

)

) Date

)

Plaintiff,

vs.

Lauren Longmire
4499 Arville Street
Las Vegas, Nevada 89103

Time

And

Clark County School District
5100 West Sahara Ave
Las Vegas Nevada 89146,

COMPLAINT FOR RELIEF FROM WORKPLACE
HARRASSMENT, DISCRIMINATION AND
RACISM.

Defendant

TO: Lauren Longmire

TO: Clark County School District

A lawsuit has been commenced against you in the above-entitled Court by the Plaintiff. In order to defend against his lawsuit, you must respond to the Complaint by filing an Answer stating your defense in writing and serving

COMPLAINT FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND
RACISM.

1 a copy to the Plaintiff's within 20 days after the service of this Summons,
2 excluding the day of service. A default judgment may be entered agent you
3 without notice.

4 The Plaintiff is asking the court to:

- 5 1. Stop workplace discrimination against white male employees and
6 students.
- 7 2. Stop racism by requiring all employees to speak like they have a
8 high school diploma.
- 9 3. Stop racism by requiring black people to follow the same rules as
10 white men.
- 11 4. Stop discrimination to white men and require female employees to
12 follow the same rules as a white man.
- 13 5. Stop workplace harassment by Ordering Clark County School
14 District to never outsource or subcontract bus drivers.
- 15 6. Stop making bus drivers work for free so they can pay for the
16 Zonar system.
- 17 7. Compensate a white man when he has to do extra work to fix
18 something because a female or black employee did not perform
19 their duties correctly.

20 COMES NOW Plaintiff In Proper Person and files this Motion For Relief
21 from Workplace Harassment. This pleading is based upon the papers and
22 pleadings on file and any evidence or argument heard at the time of the
23 hearing on this matter.

24 This Court has in persona jurisdiction over all parties. All parties
25 work within the County of Clark, State of Nevada.

26 This Court should find that Lauren Longmire is liable for workplace
27 harassment, and order her to pay the Plaintiff \$9589 in actual damages and

28 COMPLAINT FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND
RACISM.

1 \$92,000.00 in punitive damages. The actual damages were calculated by using
2 the number of sick hours that I had to use in the 2012-2013 school year. The
3 punitive damages are based on her yearly salary.

4 Clark County School District should be Ordered to pay Plaintiff
5 \$5,000,000.00 (five million dollars) in actual damages for having to endure
6 eleven years of harassment discrimination and racism.

7 Clark County School District should be Ordered that they can never
8 outsource or subcontract bus drivers. When a person comes to work and has to
9 hear how they can lose their job, this is another form of harassment.

10 Clark County School District should be Ordered to pay bus drivers a
11 full eighteen minutes to do a proper pre-trip inspection on the buses. Before
12 Clark County School District started using the Zonar system we were paid
13 eighteen minutes to do a proper pre-trip inspection or twenty-four minutes if
14 our bus was in a remote lot. Now bus drivers are only paid ten minutes to do
15 the same work. We

16 Clark County School District should be Ordered to end racism within the
17 school district. Clark County School District should be Ordered that if a
18 white man has to endure racism because a black person refuses to do their job
19 correctly, or speak like they have a high school diploma, the white man's
20 wages should be doubled for that day. Clark County School District should
21 then discipline the black person by unpaid administrative leave without pay
22 for a minimum of three working days. I once asked why rules are not enforced
23 on black people; I was told black people are not capable of following the
24 rules.

25 Clark County School District should also be Ordered to end racism by
26 expecting every employee to speak like they have a High School Diploma. Clark
27 County School District has so many prejudice black people working there. They

28 COMPLAINT FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND
RACISM.

1 believe that speaking like they have a High School Diploma is "acting white".
2 If a black person refuses to get past their racism and speak like they have a
3 High School Diploma, it should be a ten day unpaid work suspension, or unless
4 a student hears it, then it should be twenty days. Black people will get over
5 their racism and will say "I am" instead of "I is", "We were" instead of "We
6 was", and pronounce the word "direction" correctly.

7 Clark County School District should be Ordered to pay a white man
8 double his daily wage if he has to do extra work because a female employee
9 refuses to do her job correctly. Clark County School District does comply
10 with equal pay for women, but discriminate against men in the process,
11 because they never make a female employee do their job correctly.

12 Clark County School District should also be Ordered to reinstate my
13 dependent's health care. I was sent an e-mail from a female school district
14 employee stating that I did not turn in a form regarding dependent health
15 care benefits. She automatically accused me of not completing the form. If
16 Clark County School District enforced the harassment rules, and then she
17 should have apologized for having a law that requires equal pay for women.
18 Then she would have taken responsibility for her actions. If she needed me to
19 repeat the same task again, she would have told me how I would have been
20 compensated for her inability to do her job correctly.

21 FACTS AND HISTORY

22 Clark County School District policy states that school bus drivers are
23 to have the students off the bus twenty minutes before class starts. That
24 means the principal at Decker Elementary School should have made sure the
25 gate was open twenty-five minutes before school starts. When the principal at
26 Decker Elementary School refused to abide by school district policy, I
27 reported her behavior to her immediate supervisor. This policy is outlined in

28 COMPLAINT FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND
RACISM.

1 a booklet published by Clark County School District called "An Employees
2 Right to Know". When I followed that policy, I was harassed and written up by
3 Lauren Longmire. This is what happens when there is a law that states "equal
4 pay" for women, but does not state "equal work". Even though Clark County
5 School District has a policy that forbids discrimination, it is never
6 enforced. This is not the first time I have been discriminated and harassed
7 by Lauren Longmire.

8 On the second day of the 2012-2013 school year, I was told by a black
9 Transportation Operations Assistant that I was going to transport high school
10 students sitting three to a seat. I proceeded to call this in to dispatch. I
11 refused to break the law in the name of racism.

12 The next morning I had to have a meeting with Lauren Longmire. Since
13 racism in a major problem within Clark County School District, she tried to
14 justify what the Transportation Operations Assistant did. She said Nevada law
15 does not apply to Clark County School District. She said that the seats are
16 39 inches wide, so 39 inches of butt could be put into each seat. She
17 violated N. R. S. 613.100

18 I then reported her actions to the Assistant Director of Transportation.
19 Since the law states "equal pay" for women, he tried to justify her actions.
20 He told me that passenger limits are based on weight. It is determined by how
21 much weight a bus can handle, and that will vary depending on the bus.

22 It was not until I reported this to the Director of Transportation the
23 situation was resolved.

24 In the summer of 2003 I was subjected to Lauren's racism as well. That
25 summer I was working as a Transportation Aide. We were at a school, and the
26 students were loading the bus. As they were getting on the bus I was putting
27 students in their car seat or seat belt, as required by that student's IEP.

28 COMPLAINT FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND
RACISM.

Lauren came onto the bus and told me that I have to get off the bus and look for the students that belonged on that bus. I followed her directions.

She never told the black bus driver to get out of his seat and get the students seated. So when we left the school, there were students standing in the bus. Their safety and well-being were compromised due to her racism.

In the 2005-2006 school year I was leaving Las Vegas High School. The bus in front of me stopped past the stop sign, with the back of the bus blocking the sidewalk, and the front of the bus in a travel lane impeding the flow of traffic. I stopped behind the stop sign, and then when it was safe to proceed, I pulled into the proper travel lane. Because I am a white man that did my job correctly, I got written up for that. I was expected to do the same illegal act everyone else did.

In the 2009-2010 school year, I and two other bus drivers left a school and traveled through the same intersection. Then road construction started in that intersection, I maintained the travel lane as directed by the construction markings. The other two bus drivers were a black man and a white female. Since the other drivers were using the left turn lane to proceed straight through the intersection, I was told that I must also use the left turn lane to proceed through the intersection.

A Transportation Investigator for Clark County School District chose to endanger the safety and well-being of the students on three different buses, rather than enforce the rules on a woman or black person.

I was able to prove that construction marking supersede permanent markings. When I proved that, I was told; "You need to just learn to go with the flow". When I reported this to his boss, he denied it.

If there is equal pay for women, because a woman can do anything a man can do, then why can't a woman drive her bus legally through an intersection?

COMPLAINT FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND
RACISM.

1 This creates more work for a man. I knew what I was doing was right, but I
2 had to prove I was right. Their actions were never challenged. It was
3 automatically considered they were right because enforcing the rules on a
4 black person is racism, and equal pay for women never means equal work. So
5 the white man gets discriminated against, and has to work twice as hard to
6 prove he is right.

7 CONCLUSION

8 Clark County School District needs to get rid of the racism, slavery,
9 harassment, and discrimination against white male employees and students. The
10 only way to accomplish this is to require all employees to speak like they
11 have a high school diploma, and all employees must follow the same rules
12 regardless of race or gender.

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14
15 Dated this 30th of December, 2013

16
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18 Michael Hill

19 PLAINTIFF IN PROPER PERSON
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28 COMPLAINT FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND
RACISM.

Michael Hill
4020 Arville Street #192
Las Vegas, NV 89103
PLAINTIFF IN PROPER PERSON

DISTRICT COURT
LAS VEGAS, NEVADA

FILED
DEC 31 12 05 PM '13
Clerk of the Court

Michael Hill
4020 Arville Street #192
Las Vegas, Nevada 89103,

) Case No.: A-13-693815-C
)
)
) Department III
)

Plaintiff,

vs.

) Date
)

Lauren Longmire
4499 Arville Street
Las Vegas, Nevada 89103

Time

And

Clark County School District
5100 West Sahara Ave
Las Vegas Nevada 89146,

MOTION FOR RELIEF FROM WORKPLACE
HARRASSMENT, DISCRIMINATION AND
RACISM.

Defendants

NOTICE: YOU ARE ADVISED THAT FAILURE TO FILE AND SERVE A WRITTEN OPPOSITION
WITHIN 20 DAYS AFTER SERVICE MAY BE UNDERSTOOD AS AN ADMISSION THAT THIS
MOTION IS VALID.

NOTICE OF MOTION

TO: Lauren Longmire; and
TO: Clark County School District

PLEASE TAKE NOTICE that a hearing on this motion for the relief
requested will be held before the Eighth Judicial District Court at 200 Lewis
Ave., Las Vegas, Nevada 89101, on the 5th day of (month) February
(year) 2014 in Department 3 at (time) 9:00 A.M.

MOTION FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND

RACISM. - 1

Eva
Martinez

1/8/14

COMES NOW Plaintiff In Proper Person and files this Motion For Relief from Workplace Harassment. This pleading is based upon the papers and pleadings on file and any evidence or argument heard at the time of the hearing on this matter.

This Court has in persona jurisdiction over all parties. All parties work within the County of Clark, State of Nevada.

This Court should find that Lauren Longmire is liable for workplace harassment, and order her to pay the Plaintiff \$9589 in actual damages and \$92,000.00 in punitive damages. The actual damages were calculated by using the number of sick hours that I had to use in the 2012-2013 school year. The punitive damages are based on her yearly salary.

Clark County School District should be Ordered to pay Plaintiff \$5,000,000.00 (five million dollars) in actual damages for having to endure eleven years of harassment discrimination and racism.

Clark County School District should be Ordered that they can never outsource or subcontract bus drivers. When a person comes to work and has to hear how they can lose their job, this is another form of harassment.

Clark County School District should be Ordered to pay bus drivers a full eighteen minutes to do a proper pre-trip inspection on the buses. Before Clark County School District started using the Zonar system we were paid eighteen minutes to do a proper pre-trip inspection or twenty-four minutes if our bus was in a remote lot. Now bus drivers are only paid ten minutes to do the same work. We

Clark County School District should be Ordered to end racism within the school district. Clark County School District should be Ordered that if a white man has to endure racism because a black person refuses to do their job correctly, or speak like they have a high school diploma, the white man's

MOTION FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND

1 wages should be doubled for that day. Clark County School District should
2 then discipline the black person by unpaid administrative leave without pay
3 for a minimum of three working days. I once asked why rules are not enforced
4 on black people; I was told black people are not capable of following the
5 rules. Clark County School District has so many prejudice black people
6 working there. They believe that speaking like they have a High School
7 Diploma is "acting white". If a black person refuses to get past their racism
8 and speak like they have a High School Diploma, it should be a three day
9 unpaid work suspension, or unless a student hears it, then it should be ten
10 days. Black people will get over their racism and will say "I am" instead of
11 "I is", "We were" instead of "We was", and pronounce the word "direction"
12 correctly.

13 Clark County School District should be Ordered to pay a white man
14 double his daily wage if he has to do extra work because a female employee
15 refuses to do her job correctly. Clark County School District does comply
16 with equal pay for women, but discriminate against men in the process,
17 because they never make a female employee do their job correctly.

18 Clark County School District should also be Ordered to reinstate my
19 dependent's health care. I was sent an e-mail from a female school district
20 employee stating that I did not turn in a form regarding dependent health
21 care benefits. She automatically accused me of not completing the form. If
22 Clark County School District enforced the harassment rules, and then she
23 should have apologized for having a law that requires equal pay for women.
24 Then she would have taken responsibility for her actions. If she needed me to
25 repeat the same task again, she would have told me how I would have been
26 compensated for her inability to do her job correctly.

27 Clark County School District should also be Ordered to give all
28 employees their correct step raise. I was on step F2. At the beginning of

MOTION FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND

1 last year, I should have received my step raise and put on step G2. I did not
 2 get a raise until this school year. I was put on step G1. A school district
 3 employee was on the news earlier this school year stating they have "millions
 4 of dollars to spend to teach illegal immigrants English". So they should have
 5 plenty of money to give the employees the raise they are entitled to.

6 7 POINTS AND AUTHORITIES

8 Amendment XIII of the United States Constitution; Neither slavery nor
 9 involuntary servitude, except as a punishment for crime whereof the party
 10 shall have been duly convicted, shall exist within the United States, or any
 11 place subject to their jurisdiction.

12 **NRS 613.100 Endangering life or property by breaking employment contract:**

13 **Penalty.** Every person who shall willfully and maliciously, either alone or
 14 in combination with others, break a contract of service or employment,
 15 knowing or having reasonable cause to believe that the consequence of his or
 16 her so doing will be to endanger human life or to cause grievous bodily
 17 injury or to expose valuable property to destruction or serious injury, shall
 18 be guilty of a misdemeanor.

19 **NRS 613.330 Unlawful employment practices: Discrimination on basis of**
 20 **race, color, religion, sex, sexual orientation, gender identity or**
 21 **expression, age, disability or national origin; interference with aid or**
 22 **appliance for disability; refusal to permit service animal at place of**
 23 **employment.**

24 1. Except as otherwise provided in NRS 613.330, it is an unlawful
 25 employment practice for an employer:

26 (a) To fail or refuse to hire or to discharge any person, or otherwise
 27 to discriminate against any person with respect to the person's compensation,
 28 terms, conditions or privileges of employment, because of his or her race,
 color, religion, sex, sexual orientation, gender identity or expression, age,
 disability or national origin; or

(b) To limit, segregate or classify an employee in a way which would
 deprive or tend to deprive the employee of employment opportunities or
 otherwise adversely affect his or her status as an employee, because of his
 or her race, color, religion, sex, sexual orientation, gender identity or
 expression, age, disability or national origin.

2. It is an unlawful employment practice for an employment agency to:

MOTION FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND

1 (a) Fail or refuse to refer for employment, or otherwise to discriminate
2 against, any person because of the race, color, religion, sex, sexual
orientation, gender identity or expression, age, disability or national
origin of that person; or

3 (b) Classify or refer for employment any person on the basis of the
4 race, color, religion, sex, sexual orientation, gender identity or
expression, age, disability or national origin of that person.

5 3. It is an unlawful employment practice for a labor organization:

6 (a) To exclude or to expel from its membership, or otherwise to
discriminate against, any person because of his or her race, color, religion,
sex, sexual orientation, gender identity or expression, age, disability or
national origin;

7 (b) To limit, segregate or classify its membership, or to classify or
8 fail or refuse to refer for employment any person, in any way which would
deprive or tend to deprive the person of employment opportunities, or would
9 limit the person's employment opportunities or otherwise adversely affect the
person's status as an employee or as an applicant for employment, because of
his or her race, color, religion, sex, sexual orientation, gender identity or
10 expression, age, disability or national origin; or

11 (c) To cause or attempt to cause an employer to discriminate against any
person in violation of this section.

12 4. It is an unlawful employment practice for any employer, labor
organization or joint labor-management committee controlling apprenticeship
or other training or retraining, including, without limitation, on-the-job
13 training programs, to discriminate against any person because of his or her
race, color, religion, sex, sexual orientation, gender identity or
14 expression, age, disability or national origin in admission to, or employment
in, any program established to provide apprenticeship or other training.

15 5. It is an unlawful employment practice for any employer, employment
agency, labor organization or joint labor-management committee to
16 discriminate against a person with a disability by interfering, directly or
indirectly, with the use of an aid or appliance, including, without
17 limitation, a service animal, by such a person.

18 6. It is an unlawful employment practice for an employer, directly or
indirectly, to refuse to permit an employee with a disability to keep the
employee's service animal with him or her at all times in his or her place of
19 employment.

20 7. As used in this section, "service animal" has the meaning ascribed
to it in NRS 426.097.

21 **NRS 392.400 Condition, equipment and specifications of vehicle used for
transportation of pupils; inspection; exemption; penalties.**

22 1. All vehicles used in the transportation of pupils must be:

23 (a) In good condition and state of repair.

24 (b) Well equipped, and must contain sufficient room and seats so that
the driver and each pupil being transported have a seat inside the vehicle.
Each pupil shall remain seated when the vehicle is in motion.

25 (c) Inspected semiannually by the Department of Public Safety to ensure
that the vehicles are mechanically safe and meet the minimum specifications
established by the State Board. The Department of Public Safety shall make
26 written recommendations to the superintendent of schools of the school
district wherein any such vehicle is operating for the correction of any
27 defects discovered thereby.

28 2. If the superintendent of schools fails or refuses to take
appropriate action to have the defects corrected within 10 days after

MOTION FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND

1 receiving notice of them from the Department of Public Safety, the
2 superintendent is guilty of a misdemeanor, and upon conviction thereof may be
removed from office.

3 3. Except as otherwise provided in subsection 4, all vehicles used for
transporting pupils must meet the specifications established by regulation of
the State Board.

4 4. Except as otherwise provided in this subsection, any bus which is
5 purchased and used by a school district to transport pupils to and from
extracurricular activities is exempt from the specifications adopted by the
6 State Board if the bus meets the federal safety standards for motor vehicles
which were applicable at the time the bus was manufactured and delivered for
7 introduction in interstate commerce. On and after January 1, 2014, any new
school bus which is purchased by a school district to transport pupils must
meet the standards set forth in NRS 392.405.

8 5. Any person violating any of the requirements of this section is
9 guilty of a misdemeanor.

10 **NRS 613.020 Fraudulent representations by employment agent or broker:**
Penalty. Every employment agent or broker who, with intent to influence the
11 action of any person thereby, shall misstate or misrepresent verbally or in
any writing or advertisement any material matter relating to the demand for
12 labor, the conditions under which any labor or service is to be performed,
the duration thereof or the wages to be paid therefor, shall be guilty of a
misdemeanor.

13 [1911 C&P § 520; RL § 6785; NCL § 10466]

14 **NRS 613.030 False representations or pretenses concerning employer's**
ability to pay wages: Penalty. Any person, persons, partnership,
15 association, company or corporation, or his, her or its officers, directors
or agents, who or which shall employ for wages any person or persons in any
16 occupation, and who or which at the time of employing such person or persons
shall make any false representation or pretenses as to having sufficient
17 funds to pay such wages, and who after labor has been done under such
employment by the employee or employees shall fail upon the discharge or
18 resignation of such employee or employees, for a period of 5 days after such
wages are legally payable, to pay the employee or employees on demand the
19 wages due the employee or employees for such labor, shall be guilty of a
misdemeanor.

21 FACTS AND HISTORY

22 Clark County School District policy states that school bus drivers are to
23 have the students off the bus twenty minutes before class starts. That means
24 the principal at Decker Elementary School should have made sure the gate was
25 open twenty-five minutes before school starts. When the principal at Decker
26 Elementary School refused to abide by school district policy, I reported her
27 behavior to her immediate supervisor. This policy is outlined in a booklet
28

MOTION FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND

1 published by Clark County School District called "An Employees Right to
2 Know". When I followed that policy, I was harassed and written up by Lauren
3 Longmire. This is what happens when there is a law that states "equal pay"
4 for women, but does not state "equal work". Even though Clark County School
5 District has a policy that forbids discrimination, it is never enforced. This
6 is not the first time I have been discriminated and harassed by Lauren
7 Longmire.

8 On the second day of the 2012-2013 school year, I was told by a black
9 Transportation Operations Assistant that I was going to transport high school
10 students sitting three to a seat. I proceeded to call this in to dispatch. I
11 refused to break the law in the name of racism.

12 The next morning I had to have a meeting with Lauren Longmire. Since racism
13 in a major problem within Clark County School District, she tried to justify
14 what the Transportation Operations Assistant did. She said Nevada law does
15 not apply to Clark County School District. She said that the seats are 39
16 inches wide, so 39 inches of butt could be put into each seat. She violated
17 N. R. S. 613.100

18 I then reported her actions to the Assistant Director of Transportation. Since
19 the law states "equal pay" for women, he tried to justify her actions. He
20 told me that passenger limits are based on weight. It is determined by how
21 much weight a bus can handle, and that will vary depending on the bus.

22 It was not until I reported this to the Director of Transportation the
23 situation was resolved.

24 In the summer of 2003 I was subjected to Lauren's racism as well. That summer
25 I was working as a Transportation Aide. We were at a school, and the students
26 were loading the bus. As they were getting on the bus I was putting students
27 in their car seat or seat belt, as required by that student's IEP.

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MOTION FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND

1 Lauren came onto the bus and told me that I have to get off the bus and look
2 for the students that belonged on that bus. I followed her directions.

3 She never told the black bus driver to get out of his seat and get the
4 students seated. So when we left the school, there were students standing in
5 the bus. Their safety and well-being were compromised due to her racism.

6 In the 2005-2006 school year I was leaving Las Vegas High School. The bus in
7 front of me stopped past the stop sign, with the back of the bus blocking the
8 sidewalk, and the front of the bus in a travel lane impeding the flow of
9 traffic. I stopped behind the stop sign, and then when it was safe to
10 proceed, I pulled into the proper travel lane. Because I am a white man that
11 did my job correctly, I got written up for that. I was expected to do the
12 same illegal act everyone else did.

13 In the 2009-2010 school year, I and two other bus drivers left a school and
14 traveled through the same intersection. Then road construction started in
15 that intersection, I maintained the travel lane as directed by the
16 construction markings. The other two bus drivers were a black man and a white
17 female. Since the other drivers were using the left turn lane to proceed
18 straight through the intersection, I was told that I must also use the left
19 turn lane to proceed through the intersection.

20 A Transportation Investigator for Clark County School District chose to
21 endanger the safety and well-being of the students on three different buses,
22 rather than enforce the rules on a woman or black person.

23 I was able to prove that construction marking supersede permanent markings.
24 When I proved that, I was told; "You need to just learn to go with the flow".
25 When I reported this to his boss, he denied it.

26 If there is equal pay for women, because a woman can do anything a man can
27 do, then why can't a woman drive her bus legally through an intersection?
28 This creates more work for a man. I knew what I was doing was right, but I

MOTION FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND

1 had to prove I was right. Their actions were never challenged. It was
2 automatically considered they were right because enforcing the rules on a
3 black person is racism, and equal pay for women never means equal work. So
4 the white man gets discriminated against, and has to work twice as hard to
5 prove he is right.

6 CONCLUSION

7 Clark County School District needs to get rid of the racism, slavery,
8 harassment, and discrimination against white male employees and students. The
9 only way to accomplish this is to require all employees to speak like they
10 have a high school diploma, and all employees must follow the same rules
11 regardless of race or gender. This will be accomplished if a honorable judge
12 will order;

- 13 1. Order Lauren Longmire to pay \$9589.00 in actual damages and \$92,000.00
14 in punitive damages
- 15 2. Order Clark County School District to pay 5 Million dollars in damages
16 for not enforcing discrimination and harassment laws to protect white
17 male employees.
- 18 3. Order Clark County School district to stop harassing employees by
19 threatening to outsource or subcontract the transportation department.
20 The Judge will Order that Clark County School District cannot never
21 subcontract or outsource transportation.
- 22 4. Order Clark County School District to stop slavery and pay all bus
23 drivers eighteen minutes to do a pre-trip inspection on their bus, and
24 twenty for minutes if the bus is parked in a remote lot.
- 25 5. Order Clark County School District employees to speak like they have a
26 high school diploma.
- 27 6. Order Clark County School District to equality for all employees. Make
28 black and female employees follow the same rules. If a white man has to

MOTION FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND

1 do extra work to fix something a black or female employee did wrong
2 their wages will be doubles for the day. The offending employee must
3 also have a minimum of three days of unpaid leave.

4 7. Order Clark County School District to reinstate my dependent's health
5 care.

6 8. Order Clark County School District to give me the raise I am entitled
7 to.

8
9
10 Dated this 30th of December, 2013

11 
12 _____

13 Michael Hill

14 PLAINTIFF IN PROPER PERSON
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MOTION FOR RELIEF FROM WORKPLACE HARRASSMENT, DISCRIMINATION AND